

# **EXHIBIT B**

**From:** [Adam Slater](#)  
**To:** [Robert Kugler](#); [Thomas Vanaskie I.](#); [Laura H. Smith](#)  
**Cc:** [DECValsartan](#); [Valsartan PEC](#)  
**Subject:** [EXTERNAL]Valsartan - Request for Extension on Class Daubert briefs  
**Date:** Tuesday, April 26, 2022 5:05:40 PM

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Hello Judge Kugler:

I am writing on behalf of the Plaintiffs to request a short extension of Plaintiffs' and Defendants' deadline to submit Daubert briefs on the class experts. The reason for this request is a misunderstanding that appears to be the fault of Plaintiffs, based on Defendants' response to our request for consent to an extension. When the Court most recently extended the deadlines for the class certification briefing Plaintiffs understood this to mean that all of the class deadlines, including Daubert, had been extended consistent with what has occurred in the past. Thus, Plaintiffs believed that the deadline for the Daubert briefs was extended to Tuesday May 3, 2022. Defendants have confirmed their understanding that the only deadlines recently extended relate to the class briefing.

Plaintiffs request an extension to file Daubert briefs based on their apparent misunderstanding, to May 3, 2022. If the Court would prefer not to extend the deadline to May 3, 2022, we request to the end of this week, April 29, 2022, and Plaintiffs also agree to serve opposition to the motion filed by Defendants with regard to Plaintiffs' expert Dr. Kaplan (the filing of which alerted the Plaintiffs to the issue) within the already set time frame so that Plaintiffs will not have extra time to respond to that motion.

We apologize for this late request and for our misunderstanding of the Court's Order.

Thank you for your consideration.

Respectfully,

Adam Slater

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